

EXHIBIT C

EXHIBIT A

Party Defendants	Waste In	Volumetric Share	Increase to PRPs with Knowledge	50% Cooperation Credit to Plaintiffs
Carpenter	913,242	39.31%	43.25%	0.5%
Ashland/AETC	138,481	5.96%	6.56%	47.57%
Diaz/AETC	43,275	1.86%	2.05%	7.21%
Flexible	51,948	2.24%	2.04%	2.25%
Etched/Flexible	31,625	1.36%	1.24%	2.24%
NRM	491,500	21.16%	19.27%	1.36%
Handy	5,899	0.25%	0.23%	21.20%
Total	1,675,970	72.15%	74.63%	0.25%
				82.09%

Plaintiffs				
Cytec	309,000	13.30%	12.12%	6.06%
Ford	36,993	1.59%	1.45%	0.73%
SPS	34,579	1.49%	1.36%	0.68%
Agere	-	0.00%	0.00%	0.00%
TI	-	0.00%	0.00%	0.00%
Total	380,572	16.38%	14.92%	7.46%

Settleds				
Plymouth	14,976	0.64%	0.59%	0.59%
Quickline	1,285	0.06%	0.05%	0.05%
Navy	437	0.02%	0.02%	0.02%
Simon	3,025	0.13%	0.12%	0.12%
Unisys	3,292	0.14%	0.13%	0.13%
Rohm	-	0.00%	0.00%	0.00%
Bostik	7,125	0.31%	0.28%	0.28%
Novartis	13,450	0.58%	0.53%	0.53%
Techalloy	222,775	9.59%	8.74%	8.74%
Thomas	-	0.00%	0.00%	0.00%
Total	266,365	11.47%	10.44%	10.44%

EXHIBIT A

Waste In	2,322,907	100.00%	100.00%	100.00%
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EXHIBIT B

	Time	Gross	Factor	Net
Flexible	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	93,000	0.15	13,950
Etchant	7/1/75-6/1/76	7,150	0.65	4,648
	6/1/76-3/30/77	3,900	0.15	585
		104,050		19,183
Drums	1/72-12/73	34,000	0.95	32,300
Etchant	12/1/73-6/30/75	3,100	0.15	465
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		37,100		32,765

Diaz/AETC	1/72-12/73	-	0.95	-
Nitric Acid	12/1/73-6/30/75	-	0.15	-
Bulk	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	173,100	0.25	43,275
		173,100		43,275

Ashland/AETC	1/72-12/73	-	0.95	-
Nitric Acid	12/1/73-6/30/75	-	0.15	-
Bulk	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	216,650	0.25	54,163
Dye Waste	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	185,300	0.25	46,325
Pthalide Acid	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	50,000	0.25	12,500
CDN Waste	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	86,410	0.25	21,603
Solvents	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	12,950	0.25	3,238
Solvents	1/72-12/73	-	0.95	-
Drum	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	4,345	0.15	652

EXHIBIT B

	Time	Gross	Factor	Net
NRM	1/72-12/73	-	0.95	-
Pickle Liquor	4/24/74-6/30/75	360,000	0.15	54,000
Bulk	7/1/75-6/1/76	605,000	0.65	393,250
	6/1/76-3/30/77	295,000	0.15	44,250
		1,260,000		491,500

Handy	1/72-12/73	5,020	0.95	4769
Solvents (TCE,	12/1/73-6/30/75	7,530	0.15	1129.5
MEK, acetone)	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
		12,550		5,899

Etched/Flexible	1/72-12/73	17,500	0.95	16,625
Drums	12/1/73-6/30/75	23,000	0.15	3,450
Etchant	7/1/75-6/1/76	15,000	0.65	9,750
	6/1/76-3/30/77	12,000	0.15	1,800
		67,500		31,625

Thomas	1/72-12/73	-	0.95	-
	12/1/73-6/30/75	-	0.15	0
	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
		-		-

Carpenter	1/72-12/73	816,658	0.95	775,825
Bulk	12/1/73-6/30/75	916,114	0.15	137,417
Pickle Liquor	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
		1,732,772		913,242

Agere	1/72-12/73	-	0.95	-
	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		-		-

TI	1/72-12/73	-	0.95	-
	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		-		-

EXHIBIT B

	Time	Gross	Factor	Net
Ford	1/72-12/73	13,585	0.95	12,906
Drums	12/1/73-6/30/75	-	0.15	-
Plastics	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		13,585		12,906

	1/72-12/73	23,595	0.95	22,415
Drums	12/1/73-6/30/75	-	0.15	-
Finishing Materials	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		23,595		22,415

	1/72-12/73	1,760	0.95	1,672
Drums	12/1/73-6/30/75	-	0.15	-
Industrial Waste	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		1,760		1,672

Cytec	1/72-12/73	-	0.95	-
Bulk	12/1/73-6/30/75	193,000	0.15	28,950
Ammonia	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	116,000	0.15	17,400
Based on Driver Testimony		309,000		46,350

EXHIBIT B

	Time	Gross	Factor	Net
SPS	1/72-12/73	7,838	0.95	7,446
Drums	12/1/73-6/30/75	12,155	0.15	1,823
Chromic Acid	7/1/75-6/1/76	6,270	0.65	4,076
	6/1/76-3/30/77	5,858	0.15	879
		32,120		14,223
	1/72-12/73	8,388	0.95	7,968
Drums	12/1/73-6/30/75	12,320	0.15	1,848
Cyanide Waste	7/1/75-6/1/76	6,270	0.65	4,076
	6/1/76-3/30/77	6,573	0.15	986
		33,550		14,878
	1/72-12/73	990	0.95	941
Drums	12/1/73-6/30/75	-	0.15	-
Degreasing Fluids	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		990		941
	1/72-12/73	165	0.95	157
Drums	12/1/73-6/30/75	-	0.15	-
Acetone Waste	7/1/75-6/1/76	-	0	-
	6/1/76-3/30/77	-	0.15	-
		165		157
	1/72-12/73	110	0.95	105
Drums	12/1/73-6/30/75	-	0.15	-
Nickel Waste	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		110		105
Cyanide Waste	1/72-12/73	4,500	0.95	4,275
Bulk	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
		4,500		4,275

EXHIBIT B

	Time	Gross	Factor	Net
Plymouth	1/72-12/73	10,604	0.95	10,074
Bulk	12/1/73-6/30/75	11,667	0.15	1,750
Pickle Liquor	7/1/75-6/1/76	4,465	0.65	2,902
	6/1/76-11/31/76	1,665	0.15	250
		28,401		14,976

Quickline	1/72-12/73	1,071	0.95	1017.45
Drums	12/1/73-6/30/75	1,785	0.15	267.75
Etchant	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
		2,856		1,285

Navy	1/72-12/73	-	0.95	-
Drums/Carboys	12/1/73-6/30/75	-	0.15	-
	7/1/75-6/1/76	-	0.65	-
	6/1/76-3/30/77	-	0.15	-
Driver Testimony		-		437

Simon	1/72-12/73	-	0.95	0
Bulk/Plastic Drums	12/1/73-6/30/75		0.15	
Sulphuric Nitrate	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
Driver Testimony				3,025

Unisys	1/72-12/73	3,465	0.95	3291.75
Drums	12/1/73-6/30/75	-	0.15	0
Etchant	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.15	0
		3,465		3,292

Rohm	1/72-12/73	-		0
	12/1/73-6/30/75	-		0
	7/1/75-6/1/76	-		0
	6/1/76-3/30/77	-		0
		-		-

	Time	Gross	Factor	Net
Bostik	1/72-12/73	-	0.95	0
Bulk	12/1/73-6/30/75	-	0.15	0
Nitric Acid	7/1/75-6/1/76	-	0.65	0
	6/1/76-3/30/77	-	0.25	0
Driver Testimony		-		7,125

EXHIBIT B

	CDN Waste	Bulk	21,603
	Pthalide Acid	Bulk	12,500
	Solvents	Bulk	3,238
	Solvents	Drum	652
Diaz/AETC	Nitric Acid	Bulk	43,275
Flexible	Etchant	Bulk	19,183
	Etchant	Drum	32,765
Etched/Flexible	Etchant	Drum	31,625
NRM	Pickle Liquor	Bulk	491,500
Handy	Solvents	Drum	5,899
			1,675,967

Plaintiff Totals

Cytec	Ammonia	Bulk	309,000
Ford	Plastics	Drums	12,906
Ford	Finishing Mat.	Drums	22,415
Ford	Industrial Waste	Drums	1,672
SPS	Chromic Acid	Drums	14,223
SPS	Cyanide Waste	Drums	14,878
SPS	Cyanide Waste	Bulk	4,275
SPS	Degreasers	Drums	941
SPS	Acetone	Drums	157
SPS	Nickle Waste	Drums	105
			380,570

Settled Totals

Quickline	Etchant	Drums	1,285
Navy	Waste	Drums	437
Simon Wrecking	Sulphuric Nitrate	Bulk	3,025
Novartis	Nitric Acid	Bulk	13,450
Bostik	Nitric Acid	Bulk	7,125
Techalloy	Waste Oil	Drums	2,375
Techalloy	Pickle Liquor	Bulk	220,400
Plymouth Tube	Pickle Liquor	Bulk	14,976
Rohm			-
Unisys	Etchant	Drums	3,292
Thomas	Etchant	Drum	-
			266,365